

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-cr-108 (PAM/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	
)	
DEREK MICHAEL CHAUVIN,)	
)	
Defendant.)	
)	
)	

**DEFENDANT’S PRETRIAL
MOTION FOR LIST OF
GOVERNMENT WITNESSES**

Derek Michael Chauvin, through his attorney, Eric J. Nelson, Halberg Criminal Defense, moves this Court to enter an order requiring the Government to produce a list of all individuals they intend to call as a witness at trial, and that such list include the name and address of each potential witness, regardless of whether the government intends to actually use said witnesses in its case in chief, or rebuttal. Defendant also moves that such disclosure be made no later than one month prior to trial. The grounds upon which Mr. Chauvin bases his motion is as follows:

1. Conservation of judicial economy by providing the defendant an opportunity to examine a prospective witness' proposed testimony and, as such, contemplate potential stipulations at trial as to witness testimony;
2. Preservation of the defendant’s constitutional rights including, but not limited to, the right to effective assistance to counsel;
3. Preservation of the defendant’s right to present a complete defense because without such disclosure, the defendant cannot adequately prepare for cross-examination of government

witnesses, nor investigate the credibility, veracity, and reputation for truthfulness of each witness pursuant to the Federal Rules of Evidence.

This motion is based upon the files and records in this case, the Indictment, the Federal Statutes, the Federal Rules of Criminal Procedure, the United States and Minnesota Constitutions and upon such other and further points and authorities as may subsequently be presented to the Court.

Respectfully submitted,

HALBERG CRIMINAL DEFENSE

Dated: August 3, 2021

/s/ Eric J. Nelson

Eric J. Nelson

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